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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

TERRENCE HARRIS, an individual

Plaintiff,

v.

CREDIT ONE BANK, N.A.,

Defendant.

Case No.: 3:16-cv-00908-DMS-DHB

**JOINT MOTION TO EXTEND
TIME TO RESPOND TO INITIAL
COMPLAINT**

Response due: May 16, 2016

New response date: June 10, 2016

IT IS HEREBY STIPULATED BY AND BETWEEN Plaintiff
TERRENCE HARRIS (“Plaintiff”) and Defendant CREDIT ONE BANK, N.A.
 (“Defendant”), and through their respective counsel, as follows:

{Terrence Harris Joint Motion;1}

1 WHEREAS, the parties agree to extend the deadline for Defendant to
2 respond to Plaintiff's Initial Complaint to June 10, 2016;

3 The parties enter into this Stipulation at Defendant's request because
4 Defendant's counsel represents that they have only recently been retained, and
5 who, due to the press of business, require additional time to respond to the
6 allegations in the Complaint. The additional time is necessary to investigate the
7 claims asserted in the Complaint.

8 That Defendant shall have an extension of time up to and including June 10,
9 2016 within which to respond to Plaintiff's Complaint.
10

11 **IT SO STIPULATED.**

12 **ANKCORN LAW FIRM, PC**

13
14 Dated: May 11, 2016

s/Mark Ankcorn _____

15 Mark Ankcorn
16 *Attorney for Plaintiff,*
17 *TERRENCE HARRIS*

18
19 **CARLSON & MESSER LLP**

20 Dated: May 11, 2016

s/David J. Kaminski _____

21 David J. Kaminski
22 Shawn Eldridge
23 *Attorneys for Defendant,*
24 *CREDIT ONE BANK, N.A.*
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SIGNATURE CERTIFICATION

Pursuant to Section 2(f)(4) of the Electronic Case Filing Administrative Policies and Procedures Manual, I hereby certify that the content of this document is acceptable to Mark Ankorn, counsel for Plaintiff, and that I have obtained his authorization to affix their electronic signatures to this document.

CARLSON & MESSER LLP

Dated: May 11, 2016

s/David J. Kaminski
David J. Kaminski
Attorney for Defendant,
CREDIT ONE BANK, N.A.